

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

ANGEL ORTIZ ANGLERO AND REINALDO  
ILARRAZA MEDINA

Plaintiffs

vs.

CROWLEY TOWING AND TRANSPORTATION  
COMPANY AND SEAFARERS INTERNATIONAL  
UNION OF NORTH AMERICA, ATLANTIC,  
GULF, LAKES AND INLAND WATERS  
DISTRICT, AFL-CIO

Defendants

\* \* \* \* \*  
ORLANDO RODRIGUEZ et al.

Plaintiffs

vs.

CROWLEY TOWING AND TRANSPORTATION  
COMPANY AND SEAFARERS INTERNATIONAL  
UNION OF NORTH AMERICA, ATLANTIC,  
GULF, LAKES AND INLAND WATERS  
DISTRICT, AFL-CIO

Defendants

\* \* \* \* \*

CIVIL NO. 97-2437 (CCC)

JURY TRIAL REQUESTED

CIVIL NO. 98-1548 (CCC)

JURY TRIAL REQUESTED

MOTION FOR SUMMARY JUDGMENT

TO THE HONORABLE COURT:

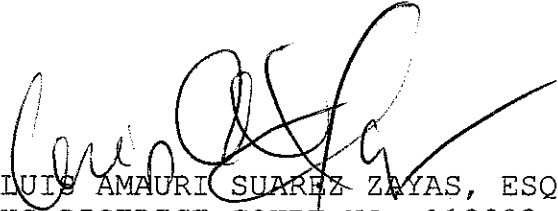
Plaintiffs in CIVIL NO. 97-2437, by and through counsel,  
respectfully move this Court, pursuant to Rule 56 of the Federal  
Rules of Civil Procedures, to grant summary judgment for plain-  
tiffs in the instant case. A Statement of Uncontested Material  
Facts and supporting Memorandums is accompanied.

WHEREFORE, plaintiffs respectfully request the Court to  
grant their motion for summary judgment.

08 AUG 30 PM 3:35  
U.S. DISTRICT COURT  
SAN JUAN, P.R.  
CLERK'S OFFICE

I certify that on this same date I sent copy of the foregoing motion to attorney Ana Rosa Biascochea, to P.O. Box 195332, San Juan, PR 00919-5332; to attorney Raquel M. Dulcaides, to fax 751-4068 and to P.O. Box 366104, San Juan, PR 00936-6104; to Ellen Silver, Esq., 5201 Auth Way, Camp Springs, Maryland 20746 and to attorney J.H. Zidell, to fax 305-865-7167 and to City National Bank Building, 300 71 St. #605, Miami Beach, FL 33141.

Respectfully submitted, this 30 day of August 2004.



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